

EXHIBIT J

1 UNCERTIFIED ROUGH DRAFT

2 THE VIDEOGRAPHER: This is the start
3 of Media Labeled Number One of the video
4 recorded deposition of Kalman Weber in
5 the matter of National Association for
6 the Advancement of Colored People, Spring
7 Valley Branch, et al., v. East Ramapo
8 Central School District, et al. in the
9 United States District Court, for the
10 Southern District of New York.

11 This deposition is being held at 885
12 Third Avenue, New York, New York on
13 November 15, 2018, at approximately 11:14
14 a.m. My name is Robert Rinkewich. I am
15 the legal video specialist from TSG
16 Reporting, Inc. headquartered the at 747
17 Third Avenue, New York, New York. The
18 court reporter is Christina Diaz in
19 association with TSG Reporting. Counsel,
20 please introduce yourselves.

21 MS. ELSNER: Kate Elsner, from
22 Latham & Watkins on behalf of plaintiffs
23 in this case.

24 MR. MANGAS: Russell Mangas, Latham
25 & Watkins on behalf of plaintiffs.

1 UNCERTIFIED ROUGH DRAFT

2 p.m. This is the end of Media Number 3.

3 We are off the record.

4 (Recess)

5 THE VIDEOGRAPHER: The time is 3

6 p.m. This is the start of Media Number

7 4. We are on the record.

8 BY MS. ELSNER:

9 Q. Mr. Weber, today we have gone
10 through approximately ten advertisements, and
11 you testified that you weren't responsible for
12 any of them, correct?

13 A. I don't know. I wasn't responsible
14 for any of them? I don't remember. There was
15 nothing that I had done there? The ones you
16 showed today, yes, that's correct. I didn't
17 do any of them.

18 Q. And earlier, you had testified that
19 these advertisements, they said that they were
20 sponsored by you or sponsored by SERTA but
21 that they weren't?

22 A. That's correct.

23 Q. Before today, did you know that
24 other individuals were using your name and
25 using SERTA's name in order to put

1 UNCERTIFIED ROUGH DRAFT

2 advertisements out to the community?

3 A. Yes.

4 Q. And did you review any of those
5 advertisements before they were put out?

6 A. No. I saw them in the community. I
7 never got to see anything.

8 Q. Ad you don't know who has been
9 responsible for using your name --

10 A. No.

11 Q. -- for advertisements? Does that
12 trouble you that individuals were doing that?

13 A. That troubles me very much.

14 Q. And when --

15 A. Because some things weren't true
16 what they put in. I don't remember offhand,
17 and I would never put my name to some of the
18 things that they put.

19 Q. When you found out that individuals
20 were putting your name and SERTA's name on
21 advertisements that you weren't responsible
22 for, what did you do about that?

23 A. I didn't know who they were. What
24 should I do? I didn't know who they were, but
25 if I let word out in the community that they